## 

## Ballard Spahr

1675 Broadway, 19th Floor New York, NY 10019-5820 TEL 212.223.0200 FAX 212.223.1942 www.ballardspahr.com Thomas B. Sullivan Tel: 212.850.6139 Fax: 212.223.1942 sullivant@ballardspahr.com

Application granted.

SO ORDERED.

April 3, 2024

Via ECF

The Honorable Ronnie Abrams Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007 Hon. Ronnie Abrams April 4, 2024

Re: Mitchell v. Gannett Co., No. 24 Civ. 284 (RA) (S.D.N.Y.)

Dear Judge Abrams:

We represent Defendants Gannett Co., Inc., Gatehouse Media Pennsylvania Holdings, Inc., Gatehouse Media Indiana Holdings, Inc., and CA Florida Holdings, LLC (collectively, the "Gannett Defendants") in the above-captioned matter. With the consent of all counsel who have appeared in this action, we write pursuant to Rules 1(D) and 4(E) of this Court's Individual Practices to request an adjournment of the initial pretrial conference in this matter, currently scheduled for April 12, 2024, at 4:00 P.M., and the corresponding deadline for submission of a joint letter and proposed case management plan, currently scheduled for April 5, 2024.

On March 29, 2024, Plaintiffs filed their First Amended Complaint. The Gannett Defendants' motion to compel arbitration and motion to stay and the non-Gannett Defendants' responses to the First Amended Complaint are due May 24, 2024. Those motions will not be fully briefed until July 12, 2024. In addition, new defendants were named in the First Amended Complaint who have not yet appeared. The parties would respectfully request that the initial pretrial conference and the corresponding deadline for submission of the joint letter and proposed case management plan be adjourned without date, with the conference to be scheduled by the Court, if necessary, after the new parties have appeared and the motions are resolved.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ Thomas B. Sullivan